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DOW CHEMICAL COMPANY
GENERAL OFFICE BUILDING
Attention: Arthur E. Schober
Post Office Box 1706
Midland, Michigan 48640

Dec. 1, 1972

AMENDMENT: PREPLANT FUMIGATION
DOWFUME MC-2
EPA Reg. No. 464-104
Your application of October 6, 1972

BEST DOCUMENT AVAILABLE

1. The efficacy data supports claims for use in sandy and fine textured clay loam soils to treat tree replanting sites in citrus or almond groves and peach orchards. Also, we believe the following claims would be acceptable:

- ✓ (A) Control of citrus, burrowing and root knot nematodes at a dosage range of 1 to 1 1/2 pounds per 100 square feet.
- (B) Control of Phytophthora root rot at a rate of 1 1/2 pounds per 100 square feet but the "tarping" method of application should specify a 4-day exposure period.
- (C) Control of Armillaria root rot using 1 to 1/2 pounds per 100 square feet for light sandy soils and a 2 pound rate for fine textured clay loam. Also, the soil moisture should be low at the time of treatment to obtain adequate control of Armillaria.

2. The "augering" and "Tree-Site-Injector" method need clarification with respect to the number of injections or holes to make per stated area and the amount of the product to release per injection or hole. We believe you intend that the entire dosage per 100 sq. ft. be released at each injection site or hole but the labeling is not clear.

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3. The "Back Hoeing" method of application needs clarification with respect to the dosage recommendation which specifies an area of 100 sq. ft. and the "planter box" area which would be the width of the back hoe (possibly 1.5 ft.) X 6 feet or 90 sq. ft. Again we believe you mean that the dosage treats an area of 100 sq. ft. but that the treatment is applied only to the back-hoed area.
4. We wonder if the augering method should have a direction to tamp or compact the soil in the refilled hole to prevent too rapid escape of the fumigant from that area.
5. Page 6 was missing from all copies of the label. These are needed for a complete review.
6. See our comments of 31 October 1972, numbers 3,4,5 and 8.
- Sincerely,

T. E. Adamczyk *RFM*
Chief
Fungicide-Herbicide Branch

EPA:PR:RFM:ps 11-30-72

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